

PUBLIC CONVENIENCES PHASE 2 - FUTURE OPTIONS FOR THE PROVISION OF PUBLIC CONVENIENCES

Report by Service Director Asset & Infrastructure

SCOTTISH BORDERS COUNCIL

28 June 2018

1 PURPOSE AND SUMMARY

- 1.1 This report updates progress in relation to the implementation of charging for access to 27 public conveniences across the Scottish Borders, provides feedback on the community response to the potential development of Comfort Schemes and Community Partnerships for public conveniences, and makes recommendations for the future options for public conveniences provision.**
- 1.2 A report and its recommendations were considered and approved by the Executive Committee on 31 January 2017; this was further agreed following a call in request at the meeting of Scottish Borders Council on 9 February 2017.
- 1.3 The previous report proposed the introduction of charging for access to 27 public conveniences and Members agreed to implement 'Option 5' at that time (which is detailed below) and which set the charge at 30p;

"OPTION 5: In phase 1 introduce charging at a number of facilities as well as engaging local members and communities on potential partnership arrangements. In phase 2 introduce partnership arrangements and evaluate options to rationalise the overall number of toilets provided."
- 1.4 It was estimated at that time that this would generate income of £268k per annum and allow us to create a £10k budget to support the creation of Comfort Schemes/Partnerships.
- 1.5 Members also agreed to Council undertaking engagement over the possibility of the creation of Comfort Schemes/Partnerships with the wider community. This report provides an update on the feedback received to date.
- 1.6 This report responds to the requirement to bring a further report on future options for the provision of public conveniences.

2 RECOMMENDATIONS

2.1 I recommend that Scottish Borders Council :-

- (a) Notes the findings of this report;**
- (b) Agrees to the development of Option 5 (Item 7.5);**
- (c) Agrees to undertake a formal procurement exercise to identify a 3rd party partner to undertake the Design, Operation and Management of the public toilet network aimed at maximising efficiencies whilst sustaining facilities for a fixed annual fee;**
- (d) Agrees to a further report to Council on the findings of this procurement exercise.**

3 BACKGROUND

- 3.1 In January 2017 the Council Executive agreed to the introduction of charging for access to 27 of its 41 public conveniences as part of the revenue budget setting process for 2017/18. Those facilities are listed below;

1.	Eyemouth Bantry car park
2.	Coldstream Court house car park
3.	Jedburgh Lothian Park
4.	St Abbs Harbour
5.	Galashiels High Street, car park
6.	Galashiels Bank Street Gardens
7.	St Boswells Main Street
8.	Earlston Bus station
9.	Peebles School Brae
10.	Lauder The Avenue
11.	Peebles Kingsmeadows
12.	Hawick Howegate
13.	Eyemouth Harbour (FMA)
14.	Selkirk Market Place
15.	Innerliethen Hall Street
16.	Hawick Volunteer Park
17.	Yarrow Valley St Marys Loch
18.	Coldingham Coldingham Sands
19.	Kelso Shedden Park
20.	Melrose Abbey Place
21.	Hawick Common Haugh
22.	Peebles Eastgate car park
23.	Jedburgh TIC
24.	Newcastleton Langholm Street
25.	Duns Briery Baulk
26.	Kelso Woodmarket/Horsemarket
27.	Galashiels Transport Interchange

- 3.2 The approved report assumed, based on previous monitoring of the use of public conveniences, that charging for use could generate an estimated annual income of £268k.
- 3.3 Following approval, the first units went live in the middle of June 2017 with all units operational by the middle of July 2017. What is apparent from financial monitoring is that revenue income received to date is significantly less than the estimated levels that were forecast. A revised full year of income of £89k is now being estimated, a shortfall of some £179k which in turn was expected to also cover the cost of the implementation of Comfort Schemes.
- 3.4 A significant body of anecdotal evidence around payment avoidance has been received and observed, including from Elected Members. This centres around tailgating (following the previous paying entrant into the facility), the 'good Samaritan' (people exiting the facility allowing free access by holding the entry door open), families paying one fee for multiple usage or antisocial behaviour, where people vandalise doors or wedge them open, allowing free access to all.

- 3.5 The previous report also emphasised the potential for communities to become involved in the delivery of facilities either through the creation of Comfort Schemes or a Partnership approach. Consultation has been undertaken with relevant groups and businesses to initiate dialogue.
- 3.6 Community Councils (67), 'critical friends' (54) and appropriate business (310) were contacted by letter in May 2017 (See appendices 1,2 & 3) and advised of the decision to implement charging and inviting them to provide feedback and/or note interest in creating a Comfort Scheme.
- 3.7 Four out of the 64 Community Councils in the region responded (Lanton, Newtown, Earlston and Kelso Community Councils). Their responses are detailed at appendix 4, along with the Council response they were supplied at the time.
- 3.8 There were no responses from 'critical friends' – please see appendix for full list.
- 3.9 310 letters were issued to local businesses, of those, 31 responded noting interests in becoming a comfort scheme and 3 responded declining any involvement. Where a business registered their interest, a further audit was undertaken in September of 2017, to ascertain the nature of facilities and opening hours on offer at each premise (see appendix 6 & 7 for details).

4 COMMUNICATIONS

- 4.1 Prior to implementation of charging, advance signage was installed at facilities, advising the public of the impending introduction of paid for entry systems along with a timescale for implementation of early summer.
- 4.2 The project team also created on line information which outlined the position and next steps along with a set of Frequently Asked Questions (FAQ's). The FAQs were expanded as the roll out went live and more enquiries were received about the new charging regime.

5 PUBLIC RESPONSE TO TOILET CHARGING

- 5.1 Following implementation, there were 162 customer enquiries relating to public conveniences for the period 1 June to 31 December 2017, and 28 formal complaints received about public conveniences during the same time period.
- 5.2 Seven complaints stated an unhappiness/anger about having to pay to access the facilities, the remainder were about the service received on paying for access and related to the cleanliness of facilities and/or operational issues with the coin collection units.
- 5.3 Of the customer enquiries logged, the feedback ranged from: cleanliness or condition of facilities and operational issues with door locking/payment units, lost property, opening hours for special events, provision for bus/taxi drivers, with only a small number of enquiries regarding charging.

- 5.4 As part of the roll out an option to pay by card was included in the Galashiels Transport Interchange. This allows people to use credit/debit cards to pay for access and includes a number of prepaid cards. These cards could be sold and or distributed to individuals/groups/business and used to gain access to the facilities by placing the card/passing the card through the reader.
- 5.5 Several customer enquiries have commented about the lack of coin change machines in proximity to units. The card payment option could be rolled out to more strategic sites should it be felt to be an affordable and flexible alternative which would also reduce the extent of cash handling required.
- 5.6 A table detailing the nature of each complaint is presented at appendix 8

6 RESPONSE FROM BUSINESS

- 6.1 Letters were sent to 310 local businesses that had been identified as most likely to have toilets for customers in their establishments, inviting them to register their interest in the Comfort Schemes/Partnership approach. Responses were received from only 31 locations (10% of the total), noting their interest with a further 3 declining any future involvement. 89% of businesses therefore did not respond to the enquiry which is a disappointing outcome.
- 6.2 Appendix 6 details the business and their locality. The establishments that noted interest comprised a range of types: Hotel/bars (urban and rural), Cafes, Guest Houses, Places of worship, Sports facilities and Offices. Of these, several are situated in proximity to existing key facilities, such as those in Melrose, Lauder, Duns and Eyemouth.
- 6.3 Of those registering their interest, a further assessment of facilities was undertaken in September 2017, asking them to confirm the type of facilities they had available, including;
- Disabled access
 - Baby changing
 - Female / Male toilets
 - Hand Drying facilities
 - If whole body changing facilities are available (Changing Place)
 - Opening hours

Further analysis of the responses to the self-assessment is required including site visits to establish the feasibility of their inclusion in any future initiative (see 7.4).

- 6.4 Despite a positive response from some businesses, overall income has fallen significantly short of what was forecast and therefore there is currently insufficient budget available to fund the comfort schemes and partnerships. The options outlined in section 9 of this report suggest ways to address the current financial under performance of the service. Further consideration on the creation of Comfort Schemes/partnerships is required, in anticipation of a budget being identified to sustain and fund the schemes.

This consideration should include, where businesses have indicated a willingness to take part in the comfort schemes, the following:

- 6.4.1 Where the Council facilities are clearly generating a significant level of income it may not be appropriate to fund Comfort schemes/partnerships in that locality, as they in turn could impact on the income being generated for the Council directly.
- 6.4.2 Where no other Council facilities are provided, consideration to entering into agreements with those businesses should be given, but only if sufficient income is being generated to cover the increased costs of this additional provision or alternatively further savings through selected closures have been achieved.
- 6.4.3 Where the Council has facilities, which are free to access or are charged for access but significantly under-performing financially, then consideration should be given to entering into a third-party agreement with a business instead of sustaining the Council facility, or if appropriate entering into a partnership agreement over the future use of the Council facility.

7 OPTIONS

As a consequence of the shortfall in achieving the previously estimated income from the introduction of charging, a revised strategic approach for public conveniences is required. Options considered during the appraisal by officers, were as follows:

7.1 Option 1 – No change

Having taken the decision to install charging and demonstrated that this does not generate the anticipated level of income; it may be that any further change is not desired and so maintaining the status quo could be considered.

Strengths	<ul style="list-style-type: none">• All toilets kept open
Weaknesses	<ul style="list-style-type: none">• Full Savings not achieved• Capital investment required to maintain facilities, imposing sustained budget pressure on service

Given the general financial outlook it is not considered appropriate to pursue this option as it is not sustainable in the mid-long term and fails to address the need for change.

7.2 Option 2 – Increase Charging Rate

Increase current 30p charge across 27 facilities to 50p charge per visit.

Strengths	<ul style="list-style-type: none">• Potential for increased income (offset against reduction in usage)
Weaknesses	<ul style="list-style-type: none">• Reduced accessibility/affordability of facilities to customers• Increased cost avoidance• Full savings not achieved

Any increased charge for access is likely to meet with criticism and may serve to drive down use and therefore negate any anticipated increase in income and payment avoidance may also increase.

7.3 **Option 3 –Expand Charging to All Facilities**

Roll out charging to all 41 facilities in the Scottish Borders.

Strengths	<ul style="list-style-type: none"> • Potential for increased income (offset against reduction in usage/cost of collection in remote areas)
Weaknesses	<ul style="list-style-type: none"> • Costs of capital investment and the payback period unfavourable. • The remote nature of some of the facilities makes payment avoidance highly likely and render any investment ineffective. • Full savings not achieved

Given the installation/maintenance costs of charging units across the network, offset against usage levels and payment avoidance, this is not considered as the preferred option.

7.4 **Option 4 – Rationalise network**

Combined approach of selected closures (based on usage and location), seasonal/reduced opening hours and comfort schemes (subject to assessment as outlined in 6.4).

Strengths	<ul style="list-style-type: none"> • Focus resources on facilities based on usage & proximity to parks/transport/other facilities • Deliver savings
Weaknesses	<ul style="list-style-type: none"> • Future years savings not realisable; • Reputational risk of selected closures

Based on the diversity of the network and the unique challenges across each location, the sites have undergone an initial appraisal which identified 24 facilities for possible closure, focussing resources on comfort scheme/partnership support and retention of 17 key facilities – see Appendix 10 for details. However, any closures come with reputational risk and we will actively seek to avoid this wherever possible.

7.5 **Option 5 – Appoint a 3rd party to undertake the management of the network and delivery of public toilet facilities.**

Early soft market testing discussions have highlighted the scope to undertake a holistic appraisal of the network, seeking to ensure efficiencies are made whilst facilities are retained and closures avoided wherever possible. A specialist 3rd party would be commissioned to undertake a comprehensive appraisal of:

- Design – assessing the whole estate, identifying opportunities for enhancing efficiency and performance via building configuration/facilities design

- Operational delivery – cleaning, servicing, opening hours and cash collection
- Cash collection methods – optimal means of cash collection for charged toilets
- Equalities Impact – ensuring any impact of changes can be mitigated against.

The brief would include exploration of 3rd party management based on initial findings. Any agreement would need to address the issue of risk, service standards, quality and flexibility. Critical to the agreement would be a commitment to provide and maintain ALL of the Council facilities for a defined period, therefore ensuring that loss making facilities are subsidised where required by more profitable venues.

Any recommendations for 3rd party management would require a further report but would anticipate;

- Transfer of the properties to a third party (Council retains ownership)
- Agree to an annual fixed management fee (fixed costs for financial planning)
- Guaranteed retention of all facilities for a defined period
- Arrangements for third party provider taking over the service (provision, maintenance, staff TUPE)
- Income generation (Pain/Gain sharing mechanism)
- Reviewing the estate considering proposals to change/improve efficiency and generation of additional income. For example, where several cubicles exist to reduce the numbers of cubicles to improve efficiency and utilisation, provide bike wash facilities, implement new technologies, complimentary commercial ventures etc.
- Joint shared investment for improvements

Strengths	<ul style="list-style-type: none"> • Enable a comprehensive specialist whole network appraisal • Realise potential of the estate: repurposing or reconfiguring unused/underused facilities. • Enhance provision to complementary commercial/tourism ventures (e.g. cycle tourism/community enterprise)
Weaknesses	<ul style="list-style-type: none"> • 3rd party involvement: added risk • 'Spend to save': initial budget required to commission appraisal/enter into 3rd party agreement.

Based on the need for a holistic strategic appraisal to enable informed decision making, this option is recommended for taking forward.

8 IMPLICATIONS

8.1 Financial

The level of income generated from charging for access to public conveniences is lower than was projected within the original report. A financial assessment is included at appendix 9, for the year to date, including an amended forecast for the remainder of the year to arrive at an anticipated annual revenue amount which can be reasonably expected from charging.

- 8.1.1 This reduced income created a budget pressure in 2017/18 and will continue to do so unless either income levels are increased or further savings are identified. An additional £100k saving is also proposed from 2019/20. As was recognised in the report of 31st January 2017, if estimated income levels fail to meet required targets then the funding to create and sustain comfort schemes and partnerships is also at risk.
- 8.1.2 Given the current financial position, officers have been exploring alternatives as outlined above in 7.5, which potentially generate substantial savings by the adoption of a more commercial approach to this non-statutory service.

8.2 Risk and Mitigations

- (a) There is a risk to the revenue financial plan if the savings as projected remain undelivered. Mitigating actions for this are contained in section 9 of this report with the recommended option 5.
- (b) Further risk assessments and mitigating strategies will be developed following discussions with third party providers. These may include consideration being given to closure to public conveniences.

8.3 Equalities

- (a) An Equalities Impact Assessment has been carried out on the proposal and there are no impacts for any of the groups with protected characteristics.
- (b) In response to feedback about the limited payment options for people wishing to access facilities, more card payment units could be installed at selected units in main towns, perhaps where they serve as points of arrival/transport hubs.

8.4 Acting Sustainably

Option 5 maintains at its core the idea of sustaining public conveniences for the people who live, work and visit the Scottish Borders. A sustainable financial model is required to ensure a service is provided into the medium term.

8.5 Carbon Management

There are no carbon management impacts arising from this report

8.6 Rural Proofing

There is no rural proofing implication within this report.

8.7 Changes to Scheme of Administration or Scheme of Delegation

There are no changes required to the Councils Scheme of Administration required as a result of the proposals being outlined in this report.

9 CONSULTATIONS

- 9.1 The Chief Financial Officer, the Monitoring Officer, the Chief Legal Officer, the Chief Officer Audit and Risk, the Service Director HR and the Clerk to the Council have been consulted and any comments received have been incorporated into the final report.

Approved by

Service Director of Asset & Infrastructure **Signature**

Author(s)

Name	Designation and Contact Number
Jason Hedley	Neighbourhood Operations Manager, 01835 824000 ext 8037

Background Papers: Scottish Borders Council, Thursday 30th January 2014;
Item 13 - E&I Neighbourhood Ops Admin Report

Previous Minute Reference: None

Note – You can get this document on tape, in Braille, large print and various computer formats by contacting the address below. Jacqueline Whitelaw can also give information on other language translations as well as providing additional copies.

Contact us at Jacqueline Whitelaw, Environment and Infrastructure, Scottish Borders Council, Council Headquarters, Newtown St Boswells, Melrose, TD6 0SA, Tel 01835 825413, Fax 01835 825071, email e&itranslationrequest@scotborders.gov.uk

Appendix 1- Letter to Community Councils

Jenni Craig
Service Director Neighbourhood Services

Please ask for:

Jason Hedley

Our Ref:

Comfort Scheme

Your Ref:

E-Mail:

PLACEBusServices@[scotborders.gov.uk](mailto:PLACEBusServices@scotborders.gov.uk)

Date:

24th April 2017

Dear Sir/Madam

As you may be aware, Scottish Borders Council is currently carrying out a review of its public toilet provision across the area.

The first phase will see a charge of 30 pence per use introduced at 27 of the 41 public toilets in the Borders during early summer 2017.

The toilets in the Tweeddale area will be affected as follows:

Charging

Innerleithen - Hall Street

Peebles - School Brae; Kingsmeadows; Eastgate Car Park

Free

Broughton

West Linton

The decision to introduce charging was taken in January 2017 as the Council considers carefully how to deliver high quality services in communities in the future while faced with an ongoing financial challenge and reduced resources.

As part of the next phase of the review, we want to speak to local people about the creation of a network of community toilet facilities.

We are seeking to engage with community councils, local groups, businesses and others in the community who are interested in getting involved in either a comfort scheme or community partnership:

- A comfort scheme is where a hotel, pub, shop, village hall or public building offers its toilet facilities for the public to use at no cost - regardless of whether they are a

customer or not – with the facility receiving an annual payment from the Council for doing so.

Successful comfort schemes have operated in the Scottish Borders at Eyemouth for several years. Comfort schemes also operate successfully throughout Scotland in other local authority areas.

- A community partnership is where public toilets are transferred to a community group for it to provide. A successful community scheme has operated in Coldingham for several years as well as in other Scottish local authority areas.

We are keen to hear from any groups interested in entering such a scheme and ask they contact the Council via www.scotborders.gov.uk/publictoilets or phone 0300 100 1800. The website also has more information on the comfort scheme and community partnerships, disabled access, the reasons behind the new charging scheme and a directory of all public toilets.

Following the engagement, an additional report will be presented to Councillors later this year on a longer term strategy for the provision of public toilets in the Borders. We will ensure community councils are fully informed about any further decisions made in their local area.

Yours faithfully

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JENNI CRAIG
SERVICE DIRECTOR NEIGHBOURHOOD SERVICES

Appendix 2 – Letter to Critical Friends

Jenni Craig
Service Director Neighbourhood Services

Please ask for:

Jason Hedley

Our Ref:

Comfort Scheme

Your Ref:

E-Mail:

PLACEBus
Services@scotborders.gov.uk

Date:

Dear Sir/Madam

As you may be aware, Scottish Borders Council is currently carrying out a review of its public toilet provision across the area.

The first phase will see a charge of 30 pence per use introduced at 27 of the 41 public toilets in the Borders during early summer 2017.

A full list of toilets that will see charging introduced is available at www.scotborders.gov.uk/publictoilets.

The decision to introduce charging was taken by Councillors in January 2017 as SBC considers carefully how to deliver high quality services in communities in the future while faced with an ongoing financial challenge and reduced resources.

Despite this change, there are no immediate plans to introduce charging to facilities which are currently free to access for those part of the RADAR key scheme – which sees 24 hour independent access for people with disabilities to around 7,000 fully accessible toilets in the UK.

As part of the next phase, we want to speak to local people about the creation of a network of community toilet facilities.

We are seeking to engage with community councils, local groups, businesses and others in the community who are interested in getting involved in either a comfort scheme or community partnership:

- A comfort scheme is where a hotel, pub, shop, village hall or public building offers its toilet facilities for the public to use at no cost - regardless of whether they are a customer or not – with the facility receiving an annual payment from the Council for doing so.

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We are keen to hear from any groups interested in discussing the scheme and ask they contact the Council via www.scotborders.gov.uk/publictoilets or phone 0300 100 1800. The website also has more information on the comfort scheme and community partnerships, disabled access, the reasons behind the new charging scheme and a directory of all public toilets.

Following the engagement, an additional report will be presented to Councillors later this year on a longer term strategy for the provision of public toilets in the Borders. We will ensure local groups are fully informed about any further decisions made in their local area.

Yours faithfully



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JENNI CRAIG
SERVICE DIRECTOR NEIGHBOURHOOD SERVICES

Critical Friend consultees contacted:

Borders Voluntary Care Voice
Borders Carers Centre
Melrose Parish Church
Stow St Mary of Wedale and Heriot Parish
Old Parish & St. Pauls and St. Johns Churches
Trinity and Caddonfoot
Holy Trinity Church (Episcopal)
St.Peter's Episcopal
Earlston Parish
Ashkirk and Selkirk Parish churches(linked)
Our Lady and St.Andrew
Parish of Innerleithen Walkerburn and Traquair
St. Andrew's Leckie (linked with Lyne and Manor churches)
Peebles Old Parish Church
Borders General Chaplaincy
Community Councils
Tweeddale Access Panel
Sensory Services Team
Scottish Borders Seniors Networking Forum
Borders Equality Forum
Edinburgh and Lothian Race Equality Council
Migrant Support Service
Interfaith Scotland
Thai Buddhist Dhammapadipa Temple
Dhammapadipa Temple
Jehovah Witnesses
Church of Jesus Christ of the Latter Day Saints
Planning & Economic Development
LGBT Youth Scotland (Borders)
Scottish Transgender Alliance
Scottish Borders Housing Association
Berwickshire Association for Voluntary Service
The Bridge
Scottish Borders Youth Voice
Tweeddale Youth (formerly Ishuze Youth Action)
Borders Chinese Cultural Association (BCCA) & Chinese Buddhism
Parents Councils
Children 1st
Scottish Borders Short Term Service Action For Children
Scottish Borders Children and Family Service Action For Children
Age Scotland
Pregnancy Assessment Unit
Scottish Borders Early Years Team
Penumbra Youth Project
Youth Borders
Berwickshire Housing Association
Eildon Housing Association
Citizen's Panel
ARC Scotland
Waverley Housing Association
New Horizons Borders
Borders Independent Advocacy Service
Thai Buddhism (Borders)
Innerleithen, Walkerburn & Traquair Parish Church
Scottish Borders Tenants Organisation

Appendix 3 – Letter to Businesses

Jenni Craig
Service Director Neighbourhood Services

Please ask for:

Jason Hedley

Our Ref:

Comfort Scheme

Your Ref:

E-Mail:

PlaceBusServices

[@scotborders.gov.uk](mailto:PlaceBusServices@scotborders.gov.uk)

Date:

Dear Sir/Madam

As you may be aware, Scottish Borders Council is currently carrying out a review of its public toilet provision across the area.

The first phase will see a charge of 30 pence per use introduced at 27 of the 41 public toilets in the Borders during early summer 2017.

A full list of toilets that will see charging introduced is available at www.scotborders.gov.uk/publictoilets.

The decision to introduce charging was taken in January 2017 as the Council considers carefully how to deliver high quality services in communities in the future while faced with an ongoing financial challenge and reduced resources.

As part of the next phase of the review, we want to speak to local people about the possibility of the creation of a network of community toilet facilities.

In particular, we are keen to engage with businesses who may be interested in getting involved in a comfort scheme.

A comfort scheme is where a hotel, pub, shop, village hall or public building offers its toilet facilities for the public to use at no cost - regardless of whether they are a customer or not – with the facility receiving an annual payment from the Council for doing so.

Successful comfort schemes have operated in the Scottish Borders at Eyemouth for several years. Comfort schemes also operate successfully throughout Scotland in other local authority areas.

We are keen to hear from any businesses interested in entering such a scheme and ask they contact the Council via www.scotborders.gov.uk/publictoilets or phone 0300 100 1800. The website also has more information on the comfort scheme and community

partnerships, disabled access, the reasons behind the new charging scheme and a directory of all public toilets.

Following the engagement, an additional report will be presented to Councillors later this year on a longer term strategy for the provision of public toilets in the Borders.

Yours faithfully



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Jenni Craig
Service Director Neighbourhood Services

Appendix 4 – Community Council Feedback

Community Council	Feedback provided	Response
Earlston	1.5.17 Querying extent of impact	
Kelso	14.5.17 Note concern regarding cleanliness and standards of facilities as they stand; queried coin/change availability; concerned at impact of charging on children/young families; queries opening hours of facilities	Issued 19.06.17 – noting cleanliness concerns, advising of payment methods available; inviting continued feedback as project is implemented
Lanton	30.5.17 Expressing concern at impact of charging on tourists/visitors to Jedburgh and on aging population; queries the financial profiling of savings versus costs of running Comfort scheme	
Newtown St Boswells	01.05.2017 Requesting electronic copy of the letter	Electronic copy of letter provided

Appendix 5 – Critical Friends feedback

None given

Appendix 6 – Businesses Feedback

Of the 310 establishments contacted, 3 responded declining any involvement. 31 responded to register their interest.

Comfort Scheme Register of Interest

Establishments who have noted their interest in participating in a Scottish Borders 'Comfort Scheme' are listed below:

	Establishment Name	Establishment type	Town	Area
1.	Black Bull	Hotel/bar	Ayton	Berwickshire
2.	Laurel Bank Tea Room	Café	Broughton	Tweeddale
3.	First and Last Café	Café	Burnmouth	Berwickshire
4.	Caddonfoot Church	Place of worship	Caddonfoot	Tweeddale
5.	Allan Ramsay Hotel	Hotel/bar	Carlops	Tweeddale
6.	Clovenfords Hotel	Hotel/bar	Clovenfords	Eildon
7.	Anchor Inn	Hotel/bar	Coldingham	Berwickshire
8.	White Swan Hotel	Hotel/bar	Duns	Berwickshire
9.	Duns Golf Club	Sports	Duns	Berwickshire
10.	Waterloo Arms Hotel	Hotel/bar	Duns	Berwickshire
11.	White Swan	Hotel/bar	Duns	Berwickshire
12.	Barony Castle Hotel	Hotel/bar	Eddleston	Tweeddale
13.	Dolphinton Hotel	Hotel/bar	Eyemouth	Berwickshire
14.	Castletoun House	Guest House	Greenlaw	Berwickshire
15.	Waverley Housing	Office	Hawick	Teviot & Liddesdale
16.	Weensland Garage	Shop	Hawick	Teviot & Liddesdale
17.	Simply Scottish	Café	Jedburgh	Teviot & Liddesdale
18.	Capon Tree	Hotel/bar	Jedburgh	Teviot & Liddesdale
19.	Café U	Hotel/bar	Kelso	Cheviot
20.	Black Bull Hotel	Hotel/bar	Lauder	Eildon
21.	Golden Bannock	Hotel/bar	Lauder	Eildon
22.	Lauder Community & Leisure Centre	Sports	Lauder	Eildon
23.	The Plough Inn	Hotel/bar	Leitholm	Berwickshire
24.	The Plough Inn	Hotel/bar	Melrose	Eildon
25.	The Lodge at Carfraemill	Hotel/bar	Oxton	Eildon
26.	Cringletie House Hotel	Hotel/bar	Peebles	Tweeddale
27.	Peebles Baptist Church	Place of Worship	Peebles	Tweeddale
28.	Philipburn House	Hotel/bar	Selkirk	Eildon
29.	Shell Petrol Station	Shop	Selkirk	Eildon
30.	Cloudhouse Café	Café	Stow	Eildon
31.	Gordon Arms Hotel	Hotel/bar	West Linton	Tweeddale

Appendix 7 - Follow up letter to Businesses noting interest

Martin Joyce
Service Director Asset & Infrastructure Services

Please ask for: *Jacqueline Whitelaw*
Our Ref:
Your Ref:
E-Mail: *JWhitelaw@scotborders.gcsx.gov.uk*
Date:

Dear

Thank you for expressing an interest in our proposal to operate Comfort Schemes in the Scottish Borders. As part of the next phase of the Review of Public Conveniences, we are currently developing proposals to take to Council in late 2017. It would help greatly to know more about your business, if you have not already done so, could you please complete our online questionnaire which is available at https://www.scotborders.gov.uk/info/20013/environment/790/comfort_scheme, paper copies are also available on request by emailing us at PlaceBusService@scotborders.gov.uk or by telephoning the 0300 100 1800 number.

It is likely the operation of the Comfort Scheme will include –

- A Service Level Agreement with SBC
- The Comfort Scheme fee payable in arrears possibly quarterly or annually
- Business owners taking part in promotions which includes advertising participation on SBCs Webpage as well as our social media sites.
- Displaying Comfort Scheme sign in your premises window
- Provide SBC with feedback from customers as required
- Enable SBC to carry out periodic inspections

Following the presentation and outcome of the report, we will arrange to have further discussions with you.

Yours sincerely

Martin Joyce
Scottish Borders Council

Appendix 8 - Complaints

Date received	Town	Brief description of enquiry	Closure Date
28/04/2017		Cost of cash collection and the introduction of Comfort Schemes	09/05/2017
26/06/2017	Peebles	Toilets - School Brae, Peebles. Dirty, no toilet paper, smelly and generally not fit for purpose. Not providing a service we now charge 30p for	05/07/2017
30/06/2017	Tarbrax	Unhappy with the introduction of the charge	05/07/2017
30/06/2017	Hawick	Unhappy to change provided at TI, as Café in situ toilets should be free	06/07/2017
22/06/2017	Edinburgh	Locked in the toilets at School Brae, Toilets dirty, no soap and no change given	06/07/2017
05/07/2017	Falkirk	Cleanliness of the toilets in Eyemouth	06/07/2017
14/07/2017	Jedburgh	Cleanliness of the toilets in Jedburgh	17/07/2017
19/07/2017	Peebles	I was appalled at having to pay 30 p to use a previously free facility, the stench on entering was disgusting they had clearly not been cleaned or disinfected for some time Where is the money going and how can you justify this is not only are you driving people from the high street with shop closures you are driving tourists and locals from a previously thriving community to a ghost town	24/07/2017

24/07/2017	Peebles - School Brae	The toilets are absolutely black inside, disgusting The hand wash - you can't get any soap out of the device. The water is only on for a short time. The hand drier is not efficient. Unhappy at paying 30p for condition of the toilet	28/07/2017
26/07/2017	St Marys loch	Complainant put 30p in the toilets here. It took her money, but the toilet did not open. Complainant advised that this is the third time this has happened here	28/07/2017
27/07/2017	Haugh , Hawick	I used the gents toilets this morning and I have to say they were not up to there usual standard. the floors had pools of soapy water everywhere it was like a swimming pool also the toilet bowls hadn't been cleaned nor the sinks and the mirrors were a disgrace. no soap either and it cost me 30p	03/08/2017
14/062017	Kelso	Customer was in Kelso and needed to use the public convenience. He went to use the public toilets in Kelso Square and was unhappy to find these are now being charged for, he does not agree with the 30p charge. He is also unhappy that there is a notice on the toilets to advise that no change is given, he does not feel this is right as this would mean the smallest coin a person can use would be 50p. He advised that as he pays his community charge (council tax) we should not be able to charge for the use of public toilets, he will contact his local MP if he does not receive an acceptable response	19/06/2017
16/06/2017		Customer is angry about charges for public toilets in the Borders. She has irritable bowel syndrome and will have a problem fiddling around trying to find money or going to get change. She has to go in a hurry when she needs and has no chance of making it in time. This will result in a mess and will be embarrassing. Many people have irritable bowel and will suffer the same problem. People will use gardens or public places round about instead - as they do in Duns. There is only 1 toilet in Coldstream. People don't carry change these days, they just use cards. There is no thought put into this. People are getting older and mobility is slower and there should be facilities to accommodate them for free. Please contact	19/06/2017
18/06/2017	Earlston	I understand that a charge of 30p will be required to go to these toilets. If that is the case can I suggest that they are at least have toilet roll and be a bit fresher. This was at 445 on a Sunday afternoon.	22/06/2017

07/07/2017	Coldingham Bay	<p>Customer called to make a complaint about the increased toilet charge of 30p for using the toilets mainly at Coldingham Beach.</p> <p>Customer feels families with young kids are not going to feed this machine all day and the grass area/woodland beside these toilets are going to be used as toilet facilities and she thinks this is ridiculous.</p>	07/07/2017
09/07/2017	Jedburgh	<p>We visited Jedburgh today, Sunday, 9th July. We parked in the main car park in Jedburgh, next to the Tourist information offices . My wife needed to visit the toilet, which are usually very acceptable. She called around 0855 and returned to the car, I need 30 p to access the toilet. I had no change, apart from a 50 p piece. Off she went, no change was given ! She came back to the car and was furious. There are six cubicles in the ladies, there was no paper in any of the cubicles! There was no hand towels which could have saved the day. We returned, after cycling around the four Abby's. We got back around 1500 and the lady in the next car to us was loudly complaining about the lack of paper! I await your comments.</p>	17/07/2017
06/10/2017	Eyemouth	<p>Customer is complaining about the public toilets in Eyemouth that are close to the Co-Op and the amusement arcade. He says that on a couple of occasions he has went to the toilet and the male ones have had a sign on the door advising they are closed. He says that he has medical issues and does need to use the toilet so is not happy this seems to be happening on a frequent basis. He also says the system for charging is not the best and the machines are not easy to use. He says it is not clear on how to lock the door and has sometimes found himself being stuck in the toilet and thinks the system needs to be made clearer as he says once he was in it says 'locked' in blue so he assumed this was locked however, when he went to leave he pressed it and the 'locked' went red and the door would not open.</p>	12/10/2017

13/10/2017	Peebles	<p>Customer has contacted Customer Services by email to complain about the toilet facilities in Peebles. His email reads: To whom it may concern... Have been a regular visitor to Peebles for over 60 years... Peebles being the hometown of my late mother... I was somewhat saddened to hear that financial constraint has meant that the toilet facilities at Kingsmeadow car park now require payment.... Be that as it may, I was then horrified when on Monday 9th October I came to use said toilets... To say my need to use the facilities in a hurry would be an understatement... I then tried to gain access to the toilets... Each of the four toilets were tried.. each of the four, rejected the offered and correct coinage... Not one of the four worked.... My sister and niece tried also, but to no avail... So at 3-30 pm, and in desperate need, the search was now on to locate a toilet that worked.... Is this the best that Peebles can now offer... What a come down... If money is short, why could not a charge for parking in the car park have been made, rather than hit the poorer of society with a charge for the essential and necessary toilet facilities.. which are prone to malfunction, as was the case on October 9th... How many other days will this occur.... I leave this matter with you... Except to say for the first time in over 60 years Peebles has let me down... Kind regards</p> <p>Ps.... It could have been that the persons requiring to use these facilities were elderly and infirm... What then for them?.</p> <p>Customer has contacted Customer Services by email to complain about the toilet facilities in Peebles.</p> <p>His email reads:</p> <p>To whom it may concern...</p> <p>Have been a regular visitor to Peebles for over 60 years... Peebles being the hometown of my late mother...</p> <p>I was somewhat saddened to hear that financial constraint has meant that the toilet facilities at Kingsmeadow car park now require payment.... Be that as it may, I was then horrified when on Monday 9th October I came to use said toilets... To say my need to use the facilities in a hurry would be an understatement...</p> <p>I then tried to gain access to the toilets... Each of the four toilets were tried.. each of the four, rejected the offered and correct coinage... Not one of the four worked.... My sister and niece tried also, but to no avail... So at 3-30 pm, and in desperate need, the search was now on to locate a toilet that worked....</p> <p>Is this the best that Peebles can now offer... What a come down...</p> <p>If money is short, why could not a charge for parking in the car park have been made, rather than hit the poorer of society with a charge for the essential and necessary toilet facilities. Which are prone to malfunction, as was the case on October 9th... How many other days will this occur....</p> <p>I leave this matter with you... Except to say for the first time in over 60 years Peebles has let me down...</p> <p>Kind regards</p> <p>Ps.... It could have been that the persons requiring to use these facilities were elderly and infirm... What then for them?.</p>	16/10/2017
16/10/2017	Kelso	<p>Toilets in Market Close Kelso and toilets in Snedden Park Kelso. There are two public toilets in Kelso. On Saturday 14th October I was unable to access either of them because the pay machines were faulty. The first in Market Close was jammed with coins and would not accept money, the second on Snedden Park took my money but didn't work and the door didn't open, on looking more closely this machine also had coins stuck in it. I am not against the principle of charging for the use of</p>	

		toilets but it is very important that the pay machines are in working order.	
17/10/2017	Jedburgh	I was very disappointed to recently discover the introduction of a 30p charge for the use of the public toilets at the Jedburgh car park. We often travel along the A68 and there are few opportunities for services. Having a young family it is essential to make regular stops for toilet breaks etc. In the future, due to the new charge, I am less likely to stop in Jedburgh which is a shame. 30p is a ridiculous charge as well - trying to find the spare change for it is frustratingly tricky given the digital age we live in. Please re consider this charge and reinstate the free use of public toilets in Jedburgh.	16/10/2017
27/09/2017	Peebles	<p>Customer has contacted Customer Services by email to complain about the toilet facilities in Peebles not working.</p> <p>His email reads :</p> <p>" Today (27/09/17, 14:45pm)) I wanted to use the public toilet facilities at the Eastgate car park, Peebles. I put 30 pence in the entry machine, the message read door open. Expecting to gain entry to the toilet, I turned the handle but the door would not open!! What is the point of providing toilet facilities, charging for those facilities and then have the service in question unavailable? I look forward to receiving your comments. "</p> <p>I will log a seperate enquiry to get these toilets paid some attention .</p>	29/09/2017
18/09/2017	Peebles	<p>Mrs X was a visitor to the town and had to visit the above toilets</p> <p>she left a note with the Tourist Information Service in Peebles on the Saturday she visited as the Contact Centre wasn't open.</p> <p>She wanted to complain about how unhappy and disgusted she was with the condition of the toilets and felt as if the council were not providing an adequate service especially that they were now charging 30p to enter these disgusting toilets.</p> <p>She stated that the rest of the town was a delight but felt very let down by the conditon of these toilets</p>	26/09/2017
02/09/2017	Hawick	I wish to complain about the way the public toilets in Hawick, Haugh have been designed in terms of the turnstills. There is no room to get a pram in. Obviously someone hasn't thought about the layout. I paid 30p to get in the other day but couldn't get the pram through.	08/09/2017

06/09/2017	Galashiels	The change machine doesn't allow you to open the door even after you put the correct change in. The change machine also doesn't register 20 pence pieces. This machine may as well not exist and the toilet buildings be taken down as it's a waste of money to pay a cleaner £8.33 an hour to clean public toilets the public cannot access	06/09/2017
12/09/2017	Peebles	Kingsmeadows Public Toilets in Peebles Today I had to use these facilities and paid my 30p to do so. On opening the door the smell of urine that met me was absolutely disgusting, it smelt like it hadn't been cleaned for months. On looking around the whole room including the hand washing facility and toilet was filthy and smelly. I thought that now the public were paying to use SBC's facilities that standards would have improved, it's disappointing to see they haven't. I had cause to visit these toilets before charges began and things were just the same. I think it is a bad idea to leave the four public toilets for use by both sexes. Could they not be split into 2 ladies and 2 gentlemen?	11/09/2017
25/10/2017	Peebles	Customer was a visitor to Peebles and was disgusted at the state of the toilets in School Brae. She advised that they were filthy, there was no soap and the automated hand dryer wasn't working properly - it seemed to be working in reverse. She stated that charging 30p to use such dirty facilities was terrible and didn't leave a good impression of the town with visitors.	25/10/2017
28/11/2017	Innerleithen	Went to use public toilets Innerleithen on 25th November, paid my 30 p and was stunned to see the floor was covered in water and empty plastic bottles and other debris was rammed down the toilet bowl up to the brim, toilet unflushed from previous users.	
04/12/2017	Kelso	went into Kelso today 4th Dec. with my wife to do some Xmas shopping, I made sure I had 30p so that I could access the public toilet, I always have to do this as I have Ulcerative colitis , Diabetes and have had radiotherapy for Prostate cancer, which means I always have to have access to a toilet. When I went to the toilet and put the first coin in I could not get any more in as the lock was jammed. Of course this would not happen if the toilets were free as they used to be. It would seem that as from now I will have to shop in Berwick where they have a more civilised arrangement. The upshot was we had to abandon our shopping and go home, a shame I cannot shop in my home town!	

Appendix 9 – Financial assessment

Toilet Location	Town	Actual Income 2017/18 (41 weeks)	Budgeted Income 2017/18 (41 wks)	Variance	Projected Income Full Year	Budgeted Income (Full year)	Variance
11 Horsemarket	Kelso	6,919	5,535	1,384	8,775	7,020	1,755
Abbey Street	Melrose	4,114	5,535	-1,421	5,218	7,020	-1,802
Bank Street	Galashiels	1,258	6,412	-5,154	1,596	8,132	-6,536
Briary Baulk	Duns	1,055	1,384	-329	1,338	1,755	-417
Buccleuch Park	Hawick	627	3,118	-2,491	795	3,955	-3,160
Coldingham Sands	Coldingham	1,258	3,994	-2,736	1,595	5,066	-3,471
Common Haugh	Hawick	2,099	5,535	-3,436	2,662	7,020	-4,358
Court House Place	Coldstream	2,570	15,765	-13,195	3,260	19,995	-16,735
East Station	Peebles	2,297	5,535	-3,238	2,914	7,020	-4,106
Hall Street	Innerleithen	2,168	5,563	-3,395	2,750	7,055	-4,305
Harbour Road	Eyemouth	2,233	3,561	-1,328	2,832	4,516	-1,684
High Street	Eyemouth	2,473	17,740	-15,267	3,136	22,499	-19,363
High Street	Galashiels	3,858	18,515	-14,657	4,893	23,482	-18,589
Howegate	Hawick	320	3,994	-3,674	405	5,066	-4,661
Kingsmeadows Road	Peebles	3,701	10,157	-6,456	4,694	12,882	-8,188
Langholm Street	Newcastleton	602	2,860	-2,258	763	3,627	-2,864
Lothian Park	Jedburgh	4,604	29,041	-24,437	5,839	36,832	-30,993
Market Place	Earlston	1,374	5,074	-3,700	1,743	6,435	-4,692
Market Place	Selkirk	2,082	7,841	-5,759	2,640	9,945	-7,305
School Brae	Peebles	2,960	9,087	-6,127	3,754	11,525	-7,771
Shedden Park Lodge	Kelso	334	2,426	-2,092	424	3,077	-2,653
St. Marys Loch	Selkirk	1,139	15,009	-13,870	1,445	19,036	-17,591
The Avenue	Lauder	1,406	4,345	-2,939	1,783	5,511	-3,728
The Green	St Boswells	829	5,535	-4,706	1,051	7,020	-5,969
The Harbour	St Abbs	1,162	9,861	-8,699	1,473	12,507	-11,034
Tourist Information Centre	Jedburgh	7,807	7,952	-145	9,902	10,085	-183
Transport Interchange	Galashiels	8,966	0	8,966	11,372	0	11,372
		70,215	211,373	-141,159	89,053	268,083	-179,030

Appendix 10 – Network Appraisal

As part of the ongoing monitoring and review of the public toilet network, officers have been appraising each facility assessing usage data from counters, income, and wider context based on 3 criteria:

- Usage/income
- Running costs
- Location: proximity to Public park/Public transport network/other facilities – this takes into account a range of logistical and community factors.

Based on this, the following 24 facilities were identified as possible options for closure, and provision be made available via alternative means. Closure is only recommended where the relative demand is low and/or scope for alternative provision (via comfort scheme/partnership arrangement) is high;

Town/ Locality	Location	Summary
Broughton	King George V Playing Fields	<ul style="list-style-type: none"> • Currently free. • Usage in lowest 34% across network. • Not near a major public transport link • Near play park • Alternative facilities for comfort scheme potential nearby • Option: <i>close and support local provision via comfort scheme</i>
Burnmouth	Harbour	<ul style="list-style-type: none"> • Currently a portaloo (free). • Usage data not available. • Not near a major public transport link or destination play park • Alternative facilities for comfort scheme potential nearby • Option: <i>remove and support local provision via comfort scheme</i>
Chirnside	Crosshill	<ul style="list-style-type: none"> • Currently free • Not near a major public transport link or destination play park • Possible comfort scheme opportunities available • Option: <i>close and support local provision via comfort scheme</i>
Cockburns-path	Main street	<ul style="list-style-type: none"> • Currently free • Usage in lowest 10% across network • Relative running costs amongst top 25% most expensive • Not near a major public transport link • Near local play park • Option: <i>close</i>

Denholm	Dene Road	<ul style="list-style-type: none"> • Currently free • Lowest usage of all within network • Relative running costs 2nd most expensive across network • Not near a key public transport link or major public park • Possible comfort scheme opportunities available nearby • Option: <i>close and support local provision via comfort scheme</i>
Duns	Briery Baulk	<ul style="list-style-type: none"> • Currently charged (30p) • Usage in lowest 25% across network • Not near a major public transport link or major play park • Possible comfort scheme opportunities available nearby • Option: <i>close and support local provision via comfort scheme</i>
Galashiels	Bank Street Gardens	<ul style="list-style-type: none"> • Currently charged (30p) • Not near a major public transport link • Near main civic space • Possible comfort scheme opportunities available nearby, including library/24hr supermarket/cafes/etc • Option: <i>close</i>
Greenlaw	The Square	<ul style="list-style-type: none"> • Currently free • Second lowest usage of all within network • Not near a key public transport link or major public park • Possible comfort scheme opportunities available nearby • Option: <i>close and support local provision via comfort scheme</i>
Hawick	Volunteer Park	<ul style="list-style-type: none"> • Currently charged (30p) • Not near a major public transport link • Near a major public park (with other facilities nearby at Wilton Lodge Park) • Possible comfort scheme opportunities available nearby • Option: <i>close and support local provision via comfort scheme</i>
Hawick	Howegate	<ul style="list-style-type: none"> • Currently charged (30p) • Not near a major public transport link or public park • Possible comfort scheme opportunities available nearby • Option: <i>close and support local provision via comfort scheme</i>
Jedburgh	Lothian Park	<ul style="list-style-type: none"> • Currently charged (30p) • Relatively well used (top 25%)

		<ul style="list-style-type: none"> • Near a major public transport link • On 3rd party land?? • Possible comfort scheme opportunities available nearby and public toilets available centrally at the TIC • Option: <i>close and centralise public provision at the TIC and via comfort scheme</i>
Kelso	Croft Park	<ul style="list-style-type: none"> • Currently free • Relatively low usage • Not near a major public transport link • Near a local play park • No comfort scheme facilities in close proximity • Option: <i>close/offer to local sports clubs for partnership arrangement</i>
Lauder	The Avenue	<ul style="list-style-type: none"> • Currently charged (30p) • Near a public transport link • Several comfort scheme opportunities available nearby (already noted interest) • Option: <i>close and support local provision via comfort scheme/explore community partnering</i>
Melrose	Greenyards	<ul style="list-style-type: none"> • Currently free • Owned by 3rd party • Not near a major public transport link • Near a destination play park • Several comfort scheme opportunities available nearby • Option: <i>hand back facility to 3rd party.</i>
Morebattle	Main Street	<ul style="list-style-type: none"> • Currently free • Relatively low usage (lowest 20% across network) • Not near a major public transport link or public park • No comfort scheme opportunities available nearby, but community centre could provide access to facilities under a partnership arrangement • Option: <i>close and support local provision via partnership arrangement</i>
Newcastleton	Langholm Street	<ul style="list-style-type: none"> • Currently charged (30p) • Not near a public transport link or public park • Several comfort scheme opportunities available nearby • Option: <i>close and support local provision via comfort scheme/explore community partnering</i>
Newtown St Boswells	Main Street	<ul style="list-style-type: none"> • Currently free • Relatively low usage (lowest 25% across network) • Not near a major public transport link or public park • No comfort scheme opportunities in close proximity, but near Council HQ • Option: <i>close and explore provision via Council facilities</i>
Peebles	School Brae	<ul style="list-style-type: none"> • Currently charged (30p) • Not near a public transport link

		<ul style="list-style-type: none"> • Near a public park/recreation area • Several comfort scheme opportunities available nearby, as well as 2 other public toilets • Option: <i>close and support local provision via comfort scheme</i>
Selkirk	Scotts Place	<ul style="list-style-type: none"> • Currently free • Relatively low usage (lowest 20% across network) • Not near a major public transport link or public park • No comfort scheme opportunities in close proximity • Option: <i>close and support local provision via comfort scheme</i>
St Abbs	Harbour	<ul style="list-style-type: none"> • Currently charged (30p) • Well used relative to network • Near a public transport link • Comfort scheme and potential community partnering opportunities nearby • Option: <i>close and support local provision via comfort scheme/community partnering</i>
Stow	Galashiels road	<ul style="list-style-type: none"> • Currently free • Relatively low usage (lowest 30% across network) • Not near a major public transport link • Near a public park • Potential comfort scheme opportunities in close proximity (already noted interest) • Option: <i>close and support local provision via comfort scheme</i>
West Linton	Main Street	<ul style="list-style-type: none"> • Currently free • Relatively low usage (lowest 12% across network) • Not near a major public transport link • Near a public park • Potential comfort scheme opportunities nearby (already noted interest) • Option: <i>close and support local provision via comfort scheme</i>
Yarrow Valley	St Marys Loch	<ul style="list-style-type: none"> • Currently free • Not near a major public transport link or public park • Adjacent café currently utilising facilities • Option: <i>support provision via comfort scheme to local cafe</i>
Yetholm	High Street	<ul style="list-style-type: none"> • Currently free • Relatively low usage (lowest 12% across network) • Not near a major public transport link or a public park • Possible comfort scheme opportunities nearby • Option: <i>close and explore local provision via comfort scheme</i>